



VIA ELECTRONIC DELIVERY

September 28, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Inquiry
WT Docket No. 17-200**

Dear Ms. Dortch:

As the largest shareholder of pdv Wireless, we embrace the Chairman's goals for the agency as described in his "First 100 Days" remarks at the American Enterprise Institute in May. We were encouraged to hear him identify expanding broadband capability, modernizing the FCC's rules, and promoting innovation across the communications industry as key priorities during his Chairmanship. All three of those objectives would be advanced by prompt Commission action in this proceeding. We urge the FCC to "enable" a new 900 MHz private carrier broadband service, one that would address the security, reliability and coverage requirements of utilities, other energy providers, and business enterprises of all types.

Our investment decisions, like this Commission's regulatory decisions, are focused squarely on a cost/benefit analysis. We invest in businesses backed up with a solid business case; one that presents a meaningful commercial opportunity that can be implemented in a realistic timeframe. A broadband service like the 900 MHz private carrier broadband network proposed by EWA/PDV has job creation and growth potential that is not dependent on the already well-served consumer marketplace and meets the demanding requirements of business-critical services. If approved, we are confident it would employ people throughout the nation, serving critical infrastructure and other business enterprise users whose operating requirements demand broadband capabilities beyond what is available on consumer-oriented commercial networks.

The Chairman's commitment that this Commission will seek to abide by the letter, not just the spirit, of Section 7 of the Communications Act and act promptly on proposals for new services and technologies, coupled with the FCC's recognition of the critical importance of promoting innovation, are particularly important to those considering investing in telecommunications ventures. Innovation often comes from new entrants to a marketplace, companies who identify an unserved need, a better way of



meeting an existing requirement, or a technology breakthrough. But time delays are a leading cause of death to innovative companies that require regulatory approval. Whether caused by entrenched interests that fear disruption or a burdensome agency workload, extended regulatory stasis is harmful to business development. Thus, we are particularly pleased that this Commission recognizes that its own intention not to let proceedings languish is consistent with its statutory directive.

We recognize that the Commission still is in the information-gathering stage of this proceeding and hope that it will be able to complete the NOI phase promptly. We look forward to a record supporting our belief that the 900 MHz band can be modernized to permit broadband and narrowband systems to exist compatibly and thereby create a below-1 GHz broadband option designed to accommodate the specialized requirements of the businesses and services on which this country depends every day.

Cerberus Capital Management, L.P.

A handwritten signature in blue ink, appearing to read "Mark Neurent", written over a horizontal line.

Name MARK NEURENT

Title CHIEF OPERATING OFFICER